

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

3 Gannett Drive, White Plains, NY 10604 Tel: (914) 323-7000 Fax: (914) 323-7001

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July 30, 2007

By Overnight Courier and ECF

Hon. Gerald E. Lynch
United States District Courthouse
500 Pearl Street, Room 910
New York, New York 10007

RE: American General Life Insurance Company v. The Costantino
Presta Irrevocable Trust; Mark Seelig, Eugenio Presta, and Nicola
Presta, as Trustees of the Costantino Presta Irrevocable Trust; and
HSBC Bank USA, National Association.
No.: 07 CIV. 3136

Dear Judge Lynch:

We represent plaintiff American General Life Insurance Company ("American General") in the captioned declaratory judgment action. We write to request an extension of time to conduct conferences pursuant to Federal Rules of Civil Procedure 26(f) and 16(c).

By way of summary, on April 19, 2007, American General filed a Complaint in the United States District Court for the Southern District of New York. On April 23, 2007, American General served all defendants with the Complaint. On June 25, 2007, defendant HSBC Bank USA, National Association ("HSBC") interposed an Answer. The Costantino Presta Irrevocable Trust and Mark Seelig, Eugenio Presta, and Nicola Presta, as Trustees of the Costantino Presta Irrevocable Trust (collectively, the "Trust defendants") have requested an extension of time until August 15, 2007 to interpose an Answer. The Trust defendants require additional time to explore with counsel whether it is in their best interest to oppose this action.

Accordingly, it is respectfully requested that the court delay Rule 26(f) and 16(c) conferences in this matter until after August 15, 2007, to allow the Trust defendants additional time to Answer. This is the first request for an extension of time and all of the parties consent to this request.

Thank you for your attention to this matter.

Very truly yours,
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

s/Michelle M. Arbitrio
Michelle M. Arbitrio (MA 2137)

cc: by Overnight Courier:

Mitch Schuster
Meister, Seelig & Fein LLP
Attorneys for Defendants
140 East 45th Street – 19th Floor
New York, NY 10017